

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,) CRIM. NO. 04-30032-MAP
)
vs.)
)
FRANCIS G. KEOUGH, III)
)
Defendant.)

GOVERNMENT'S MOTION FOR REVIEW

Pursuant to Title 18, United States Code, Section 3145(a), the United States of America respectfully moves this Court to review the magistrate court's denial of the Government's motion to detain defendant Francis G. Keough, III for violating his conditions of release pursuant to Title 18, United States Code, Sections 3148(b)(1)(A) and (b)(2)(A) and (B), and the magistrate court's subsequent amendment of the defendant's conditions of release.

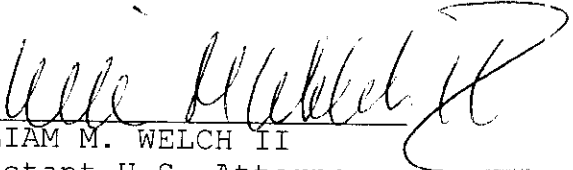
Title 18, United States Code, Section 3145(a) requires a district court's review of an order of release to be done "promptly." The Government understands that U.S. District Judge Ponsor is on vacation next week. Therefore, the Government requests that this motion be heard before the district court in Worcester. The Government intends to present evidence at this subsequent hearing.

Dated this 29th day of July, 2005.

Respectfully submitted,

MICHAEL P. SULLIVAN
United States Attorney

By:


WILLIAM M. WELCH II
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
July 29, 2005

I, William M. Welch, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by faxing said motion to:

Jack St. Clair, Esq.
73 Chestnut Street
Springfield, MA 01105

A handwritten signature in black ink, appearing to read "Will M. Welch II", written over a horizontal line.

WILLIAM M. WELCH II
Assistant United States Attorney